

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

In re:	:	
STUDENT FINANCE CORPORATION,	:	
Debtor.	:	
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CHARLES A. STANZIALE, JR.,	:	CIVIL ACTION No. 04-1551 (JJF)
CHAPTER 7 TRUSTEE OF STUDENT	:	
FINANCE CORPORATION,	:	
Plaintiff,	:	
v.	:	
PEPPER HAMILTON LLP, et al.,	:	
Defendants.	:	
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**THE FAMILY DEFENDANTS' MOTION
TO STRIKE THE TRUSTEE'S IMPROPER DAMAGE CLAIMS**

For the reasons set forth in the accompanying Memorandum, defendants Robert L. Bast, Pamela Bashore Gagné, the Brennan Trusts and W. Roderick Gagné ("Gagné") as Trustee of the Brennan Trusts (the "Family defendants") respectfully move this Court to enter an Order in the form attached hereto (1) striking the following damage claims asserted in the Trustee's July 10, 2007 Disclosure Statement: (a) the asserted payment of \$1,018,500 commitment fees paid to the Family defendants by Student Finance Company ("SFC"); and (b) the asserted fraudulent conveyance to the Family defendants by redemption of SFC stock for \$6,932,000; (2) precluding the Trustee from asserting those damage claims at trial; and (3) awarding costs, including attorney's fees, incurred by the Family defendants with respect to this Motion.

Respectfully submitted,

ECKERT SEAMANS CHERIN & MELLOTT, LLC

Dated: August 28, 2007



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Bashore Gagné, the Brennan Trusts and W.
Roderick Gagné, as Trustee of the Brennan Trusts

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